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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In The Matter of the Application of SAN DIEGO
GAS & ELECTRIC COMPANY (U 902 E) for a
Certificate of Public Convenience and
Necessity for the South Orange County
Reliability Enhancement Project

Application 12-05-020
(Filed May 18, 2012)

**RESPONSE OF FOREST RESIDENTS OPPOSING NEW TRANSMISSION LINES
("FRONTLINES") TO THE MOTION OF SOUTHERN CALIFORNIA
EDISON ("SCE") FOR PARTY STATUS**

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June 15, 2016

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In accordance with Rule 11.1(e) of the Commission's Rules of Practice and Procedure, FRONTLINES hereby responds to the "Motion for Party Status" ("Motion") filed by Southern California Edison ("SCE") in the above captioned proceeding. The Motion does not provide a reasonable basis for granting party status to SCE in the "South Orange County Reliability Enhancement Project" ("SOCREP"). Worse yet, many of the technical matters raised in SCE's motion are either entirely unsupported or factually inaccurate, as discussed in the paragraphs below.

**1.0 SCE'S CONCERNS REGARDING THE "PARALLEL" ARRANGMENT OF
ALTERNATIVE J RING HOLLOW.**

The first reason that SCE cites for its interest in the SOCRE proceeding is that Alternative J would create a "parallel system arrangement" between a 138 kV subtransmission system and a 230 kV transmission system, and that such a configuration "could prove problematic" [Page 2, last paragraph]. However, the Motion fails to disclose that a number of SCE's own subtransmission facilities are specifically *designed* to operate in a "parallel system arrangement" with its transmission facilities. The Motion also fails to point out that these SCE subtransmission systems include design features (such as "normal open" circuits) to

prevent problematic situations such as loop flow¹. Consider for example SCE's proposed Alberhill Project now pending before the Commission (Proceeding A.09-09-022). This project creates a new 115 kV subtransmission system which *precisely parallels* the 500 kV transmission line extending west from the Valley substation. As shown in Figure 1, SCE has configured the 115 kV Alberhill system with "normal open" switches to prevent parallel power flow and avoid grid impacts such as loop flow. Nothing prevents SCE and SDGE from configuring Alternative J with "normal open" switches or design elements that will allow it to operate in parallel with SCE's transmission system without causing loop flow or other impacts to SCE's system. FRONTLINES contends that SCE cannot have it both ways; if SCE truly believes that Alternative J cannot be implemented because it creates a subtransmission system which parallels SCE's transmission system, then SCE must withdraw its application for the Alberhill project because it also creates a subtransmission system which parallels SCE's transmission system.

There is no doubt that an interconnection between SCE's 230 kV transmission system and SDGE's 138 kV subtransmission system (Alternative J) can be configured to avoid the "problematic" situations of which SCE complains in its motion. More to the point, both SCE and CAISO have represented to the FERC that they are fully capable of designing and operating "parallel" subtransmission facilities in a manner that avoids "problematic" loop flow and which does not affect transmission system operation [Docket EL14-14²]. The truth is, both SCE and CAISO have **extensive** experience in operating "parallel system arrangements" involving subtransmission and transmission systems. Therefore SCE's argument does not hold water.

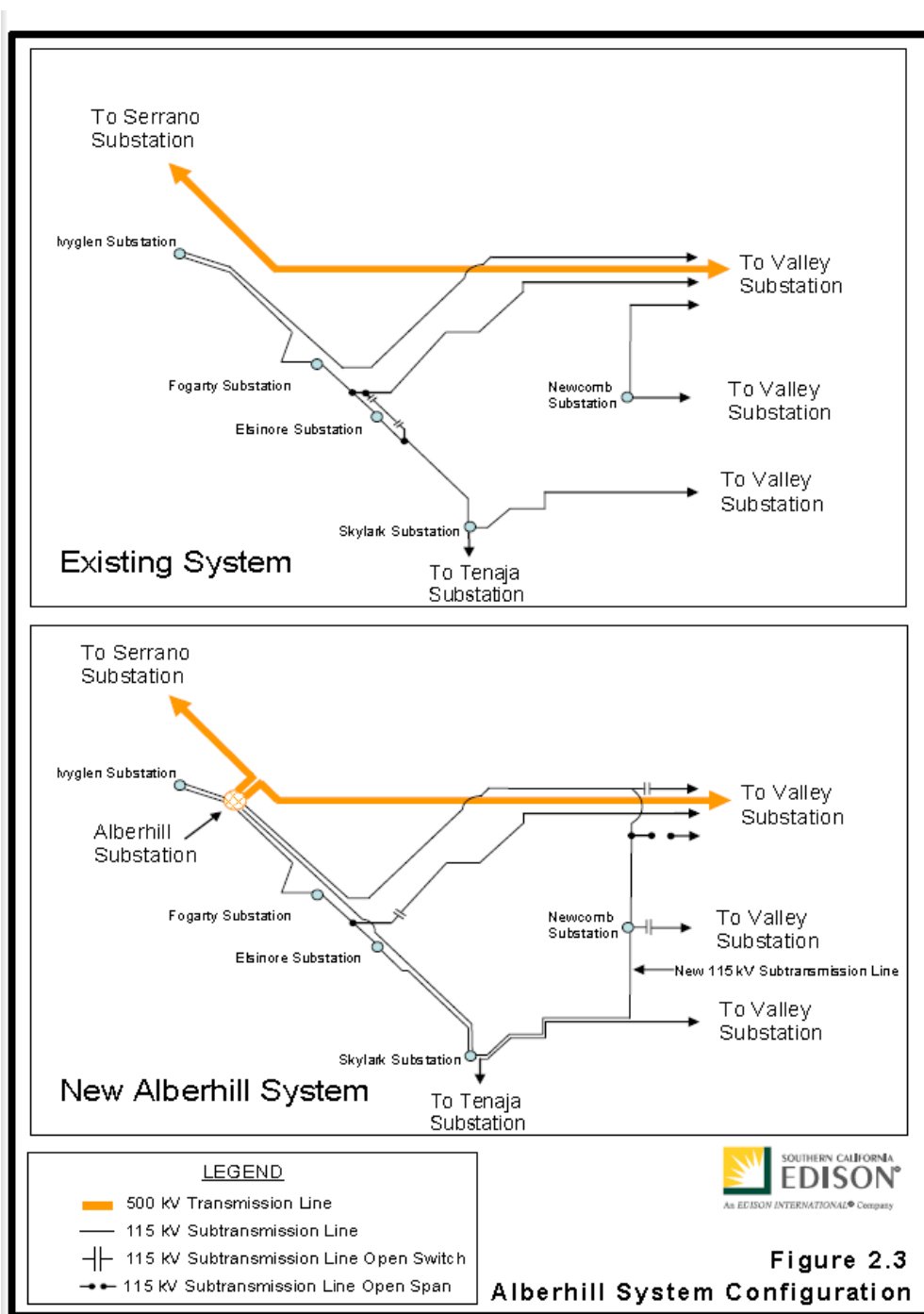
FRONTLINES is concerned by SCE's disingenuous statement that the interconnection and parallel system arrangement of Alternative J "could prove problematic". SCE has

¹ "Loop flow" is power that flows through subtransmission or distribution facilities and onto the transmission grid.

² In Docket EL14-14, FERC considered various SCE-owned 69 kV subtransmission facilities lying parallel to CAISO's transmission system. CAISO argued that parallel ("loop" flow) would be avoided on these 69 kV subtransmission facilities "through new switching and breaker schemes" that "would open breakers at four locations, eliminating parallel connections between the Antelope and Bailey substations..." [CAISO Answer at 6]. FERC accepted CAISO's argument that these 69 kV subtransmission facilities are not integrated transmission facilities because the "normal open" breaker arrangement prevents them from operating in parallel to the CAISO grid (41).

Figure 1. SCE's Proposed Alberhill Project as Depicted in SCE's PEA.

Note: the 138 kV Alberhill subtransmission system will parallel the 500 kV transmission line between Valley and Alberhill. To prevent loop flow, SCE utilizes “normal open” switches that can be closed quickly to provide power from the Valley substation in the event the Alberhill substation is removed from service.



demonstrated time and again that it is perfectly capable of using breakers and switches to prevent loop flow on subtransmission systems that operate in parallel to the transmission grid. SCE's motion misrepresents the truth and it fails to divulge SCE's particular expertise on such matters, and on this basis alone, it should be rejected by the Commission.

ALL OF THE CONCERNS REGARDING ALTERNATIVE J THAT ARE STATED IN SCE'S MOTION HAVE BEEN FULLY ADDRESSED IN THIS PROCEEDING.

According to the Motion, SCE's objections to Alternative J were enumerated in comments submitted on the Recirculated Draft Environmental Impact Report ("RDEIR"). However, an inspection of these comments reveal that SCE's concerns stem largely from SDGE's analysis of Alternative J [pages 2 – 3 of SCE's RDEIR Comments]. FRONTLINES points out that SDGE's perspective on Alternative J has already been thoroughly vetted in this proceeding, therefore these concerns as set forth in SCE's RDEIR comments have been fully addressed. Remaining concerns expressed in SCE's RDEIR comments [pages 3-6] focus on whether Alternative J could operate in "parallel" to SCE's 230 kV transmission system (which SCE is demonstrably capable of addressing, as discussed above) and the lack of precise details regarding how Alternative J is configured (which is not required under CEQA³ anyway). All other objections to Alternative J that are identified in SCE's motion have been fully addressed and effectively neutralized in FRONTLINES testimony and briefs; to wit: Alternative J does not require more upgrades to SCE's system than the SOCREP requires. SCE's motion complains that Alternative J "could lead to the need for upgrades to SCE's System" [page 3]. This is untrue, as clarified on pages 8-11 of FRONTLINES rebuttal testimony served October 19, 2015. As FRONTLINES points out, Alternative J will not

³ Section 15126.6(d) of the CEQA Guidelines states "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.. " Essentially, CEQA requires the lead agency to provide details regarding the alternative to the extent that is reasonably necessary to ascertain the impacts created by the alternative and whether such impacts are more or less significant than those created by the proposed project. The RDEIR does precisely this, therefore SCE's argument lacks legal foundation.

compel upgrades to the SCE system any more than the proposed SOCRE Project will, and the upgrade concerns that SCE contemplates (such as on the Santiago-Johanna corridor) have been on the table for years and long before Alternative J was ever conceived.

Alternative J does require modification to one of SCE's SONGS-Santiago lines to loop in the new Trabuco substation, but that is neither an "upgrade" nor a burdensome undertaking.

FRONTLINES' Alternative provides Ample Time to Coordinate Alternative J.

The Motion complains that Alternative J "would require SCE and SDGE to, among other things negotiate, execute and obtain regulatory approval for multiple agreements whose terms have yet to be considered" and that such a process would take time [page 3].

However, FRONTLINES has addressed this concern in testimony and briefs, and pointed out that implementing a simple reconductoring program and modifying Talega and Pico will ensure SDGE's SOC system complies with all NERC and CAISO standards throughout (and beyond) the 10 year planning horizon. This provides both SCE and SDGE with ample time to coordinate and develop a system interconnection at Trabuco.

It is clear from SCE's motion that SCE merely intends to re-hash matters already addressed and abundantly briefed in this proceeding; SCE brings nothing new to the table, and on that basis, its motion should be denied.

SCE HAS BEEN AWARE OF THE SOCRE PROJECT SINCE AT LEAST 2010, AND HAS CHOSEN TO NOT PARTICIPATE IN THE SOCRE PROCEEDING DESPITE AMPLE OPPORTUNITY TO DO SO OVER THE LAST 4 YEARS.

SCE's has been aware of the SOCRE Project since at least 2010, when SDGE submitted it through the CAISO request window and CAISO briefed it (along with other request window submittals) to SCE and other stakeholders at the CAISO 2011 Transmission Plan Presentation made in the Fall of 2010. SCE was again informed of the project when the Commission issued a "Notice of Preparation" ("NOP") in January, 2013. SCE was again informed of the project when the Commission issued a notice that the CEQA Screening Report was released in October 2014. The latter is particularly noteworthy, because it identified three different scenarios involving an interconnection between SDGE's SOC system and SCE's 230 kV system. SCE was again informed of the project in February 2015 when it was notified that the Draft EIR (which included several alternatives involving an

SCE interconnection) was released. SCE was again informed of the project when the Recirculated Draft EIR was released in August 2015. Yet, SCE never sought leave to participate in the SOCRE Proceeding. The very notion of SCE seeking party status at this point in the SOCRE Proceeding (after the record is closed and final briefs are long since filed) is absurd on its face, particularly since SCE has been aware that alternatives involving interconnections to SCE's 230 kV system have been on the table *for more than a year and a half*.

Furthermore, FRONTLINES is appalled by the explicit arrogance of SCE's justification for not seeking party status earlier in this proceeding. SCE's motion states that it did not seek party status earlier because "SCE did not expect the FEIR to find Alternative J to be environmentally superior to the SOCRE Project as proposed, and in fact SCE expected that Alternative J would be found infeasible given, among other things, SCE's comments." [Pages 3-4]. Apparently, SCE expected the Commission to disregard all the technical analyses, expert witness opinions, and detailed briefs submitted in this proceeding by ORA, the City of San Juan Capistrano, and FRONTLINES in favor of SCE's scant 5 pages of general and non-technical remarks submitted in response to the RDEIR. SCE's arrogance is further amplified by its complaint that the Commission's Energy Division did not accede to SCE's demand for a private meeting to "discuss significant errors in the RDEIR's findings related to the engineering consultant's analysis". Given that SCE demanded this meeting 7 months *after* the public comment period on the RDEIR had closed, it seems clear that SCE considers itself unfettered by the statutory limits that apply to the lowly citizens and ratepayers of California.

FRONTLINES contends that SCE's deliberate failure to act in the SOCRE Proceeding over the last 4 years should not be rewarded, and urges the Commission to not grant SCE party status at this late date and on the virtual eve of a proposed decision.

SCE'S MOTION IS NOT TIMELY AND IT LACKS SUBSTANTIVE BASIS.

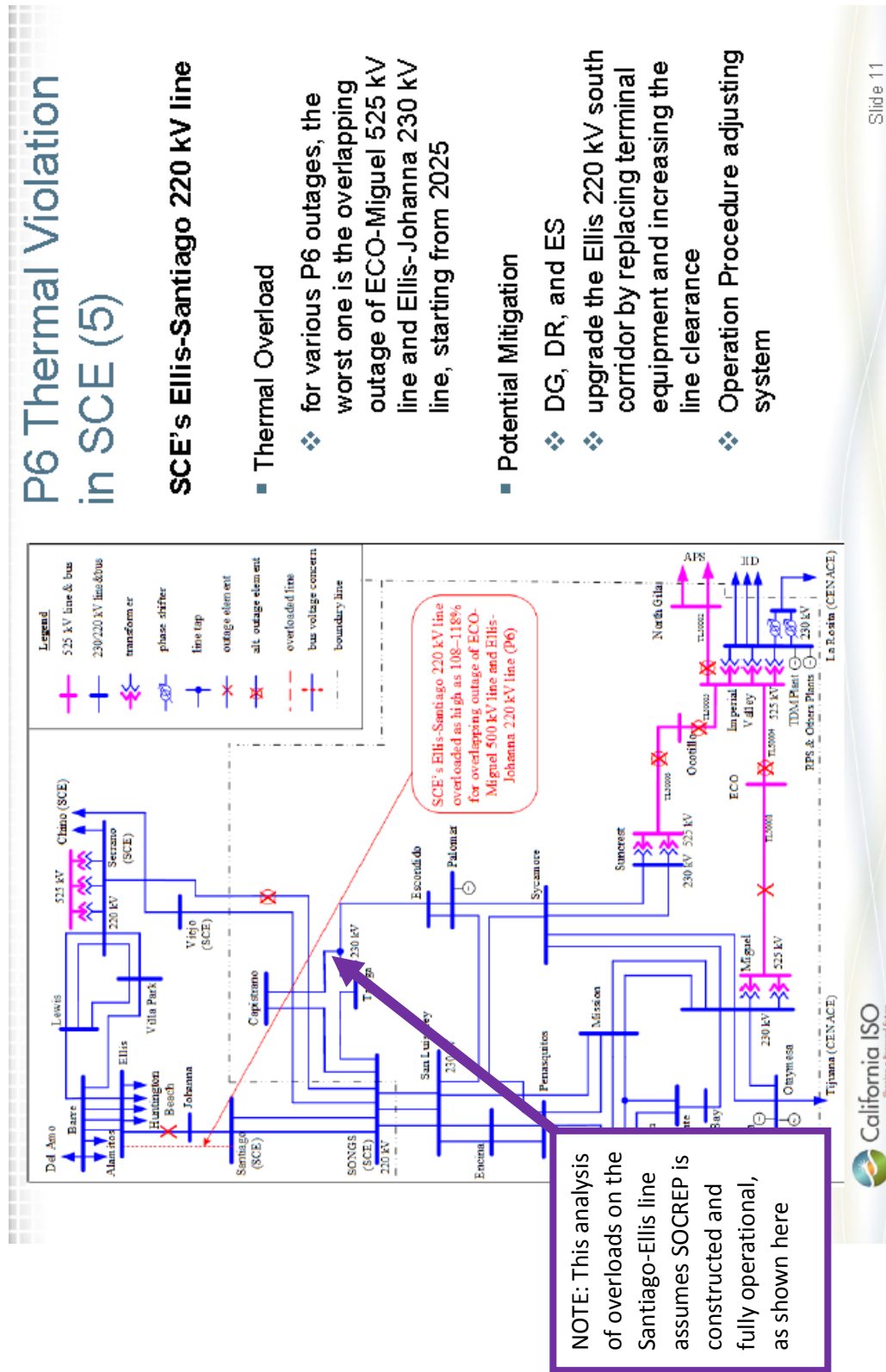
SCE avers that its motion for party status is timely [page 3] and necessary to "ensure that this proceeding – including any Proposed Decision – accurately reflects and accounts for the potential technical, legal and time constraints attendant to approval of Alternative J instead of the SOCRE Project proposed by SDG&E." However, SCE's request for party status

is neither timely (as discussed above) nor necessary to ensure that Alternative J is properly vetted in the SOCRE Proceeding. Indeed, the facts allocuted by SCE's motion are not informative and address issues that have already been fully analyzed and briefed by parties. For instance, SCE points to CAISO's 2015-2016 Transmission Plan as "proof" that overloads may occur on the Ellis-Johanna corridor, and argues that Alternative J could exacerbate this situation. [See page 4 and footnote 2]. However, SCE fails to disclose that CAISO's 2015-2016 analysis of the Ellis Johanna corridor overloads *assume that SOCREP is constructed and fully operational*, (as shown in Figure 2 which is an excerpt from CAISO's "Preliminary Reliability Assessment Results for the 2015-2016 Transmission Plan"⁴). In other words, SOCREP is an integral part of the Ellis-Johanna system overloads that are identified as in SCE's motion, therefore SCE's argument that Alternative J could exacerbate these overloads is *absurd on its face*. Moreover, FRONTLINES' testimony and briefs have fully addressed this concern, and conclusively demonstrate that Alternative J does not pose any more risk to SCE's system than the proposed SOCREP project. SCE's two other arguments are similarly lacking in merit:

SCE wrongly asserts that the FEIR is deficient because it lacks a detailed description of the circuit breakers, metering devices, and other equipment necessary for Alternative J [page 4]. CEQA does not require an FEIR to identify all the hardware and equipment components of a project alternative. To the contrary, Section 15124(c) of the CEQA Guidelines states that the proposed project itself need only have "A general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities" and (as mentioned previously) project alternatives need only be described to the extent necessary to allow a meaningful evaluation. Nothing in CEQA requires the FEIR to provide the level of detail demanded by SCE's motion.

⁴ See Slide #209 of CAISO's presentation found here:
<http://www.caiso.com/Documents/PresentationPreliminaryReliabilityAssessmentSept212015.pdf>

Figure 2. Excerpt from CAISO's Presentation on the Preliminary Reliability Results of the 2015-2016 TPP



SCE wrongly asserts that Alternative J will be hampered by regulatory issues to such an extent that it cannot be completed in a reasonable time and is therefore infeasible [page 5]

SCE's contention ignores facts presented by FRONTLINES in the SOCREP Proceeding which demonstrate that SDGE can address all of its SOC reliability concerns over the next 10 years (and beyond) by reconductoring lines and reconfiguring the Talega and Pico substations. This will provide SDGE, SCE, and CAISO with plenty of time and the "breathing room" necessary to properly plan and implement Alternative J.

SCE'S MOTION SEEKS TO REVIST MATTERS ALREADY ADDRESSED IN THE SOCREP PROCEEDING.

According to page 5 of its motion for party status, SCE merely seeks to address the potential impacts of Alternative J on SCE's system, and does not intend to revisit issues already addressed in the proceeding. It appears from this statement that SCE is unaware that FRONTLINES' testimony, exhibits, and briefs fully address the potential impacts of Alternative J on SCE's system. Therefore, and according to SCE's own standard, the Commission should not grant party status to SCE for the purpose of addressing SCE system impacts of Alternative J because doing so would revisit issues that have already been addressed in this proceeding. In fact, SCE's motion fails to identify a single issue that was not fully addressed in the SOCREP Proceeding, therefore (according to SCE's own standard) it does not provide any basis for the Commission to grant SCE party status.

For all these reasons, FRONTLINES requests that the Commission deny SCE's Motion for Party Status.

Respectfully Submitted,

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